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Mr. Gregory Rudloff
United States Environmental Protection Agency
Region 5
77 W. Jackson Blvd. LU-9J
Chicago, IL 60604

February 1, 2017

Subject: Annual Progress Report (January 1 to December 31, 2016), Dow Hanging Rock Plant, Ironton, OH EPA ID# OHR 000 157 727 and OHD 039 128 913

Dear Mr. Rudloff,

On behalf of the Dow Chemical Company (Dow), CH2M HILL (CH2M) is pleased to provide the 2016 annual progress report for the Hanging Rock Plant in Ironton, Ohio (site). This progress report was prepared in accordance with the Administrative Order on Consent between Dow and U.S. Environmental Protection Agency (USEPA) Region 5, which was finalized September 21, 2016. Below is additional information on the project status and an update to the project schedule.

Work Performed during this Period

The following work was performed during the reporting period:

- Installed and sampled new monitoring wells MW-08, MW-09, and MW-10 in February 2016 based on the results of the sitewide groundwater sampling and as discussed with USEPA in December 2015.
- Submitted the *Draft RCRA Facility Investigation Phase 2 Report Dow Hanging Rock Plant, Ironton, Ohio* to USEPA on May 25, 2016.
- Submitted the *Draft RCRA Facility Investigation Phase 3 Work Plan for The Dow Chemical Company, Hanging Rock Plant, Ironton, Ohio* to USEPA on September 27, 2016.
- Submitted the *RCRA Corrective Action Documentation of Environmental Indicator Determination, Current Human Exposures Under Control and Migration of Contaminated Groundwater Under Control* to USEPA on September 30, 2016.

Data Collected during this Period

In February 2016, additional Phase 2 field activities were conducted to install and sample three new monitoring wells to evaluate chemicals of potential concern concentrations at solid waste management unit 1 and downgradient locations. Water levels were also collected from the 10 site monitoring wells.

The extent of groundwater chemicals of potential concern has been defined by the Phase 2 investigation. Screening level exceedances occur in the center of the active facility and are bound by downgradient monitoring wells. The activities, analytical data, and conclusions of this investigation are

presented in the *Draft RCRA Facility Investigation Phase 2 Report Dow Hanging Rock Plant, Ironton, Ohio* (CH2M 2016) submitted to USEPA in May 2016.

Problems Encountered

No problems were encountered during this period.

Anticipated Project Schedule and Estimated Percent Complete

The following table lists the anticipated project schedule, including tasks, dates, and percent complete.

Task	Anticipated Date	Percent Complete
Submitted <i>RCRA Corrective Action Documentation of Environmental Indicator Determination, Current Human Exposures Under Control and Migration of Contaminated Groundwater Under Control</i>	September 2016	100%
USEPA approval of Phase 2 RFI Report	April 2017	20%
USEPA approval of Phase 3 RFI Investigation Work Plan	April 2017	20%
Conduct Phase 3 Field Investigation	April 2017	0%
Submit Phase 3 RFI Report	Q3 2017	0%
USEPA approval of Phase 3 RFI Report	Q4 2017	0%
Final Corrective Measures Proposal	Q1 2018, will be submitted 90 days following USEPA approval of the Phase 3 RFI Report	0%
Initial Cost Estimate	Q1 2018, will be submitted 90 days following USEPA approval of the Phase 3 RFI Report	0%

RCRA = Resource Conservation and Recovery Act

RFI = Resource Conservation and Recovery Act facility investigation

If you have questions on the activities completed in 2016, please contact me at (513) 673-2201 or Mr. King at (304) 747-3763.

Sincerely,

CH2M HILL

Marie W. Chiller
Site Manager

cc: Timothy A. King, The Dow Chemical Company, Remediation Leader
Project File, CH2M St. Louis office